November 8,2005

Mr. Arthur Neal Director of Program Administration United States Department of Agriculture National Organic Program, USDA-AMS-TMP-NOP 1400 Independence Avenue S.W. Washington, DC 20250

Reference: TMD-04-01

Dear Mr. Neal:

Tree Top, Inc. requests the National Organic Program (NOP) to permit the use of Peracetic Acid – for use as a sanitizer on food contact surfaces; allowed for use in handling agricultural products labeled "Organic".

This was clearly the intent of the recommendations of the National Organic Standards Board in their unanimous vote to place Peracetic Acid on the National List of Materials.

Therefore we formally request the NOP to change the language in the Proposed Rule, Federal Register Vol. 70, No. 179, Friday, September 16,2005 restricting the use of Peracetic Acid in handling agricultural products labeled "made with organic" – to permitting the use of Peracetic Acid in or/on organic products!

We appreciate your immediate action relative to our request herein and look forward to a change of status of Peracetic Acid for use in products labeled organic in the Final Rule.

Thank you.

James A. Robbins

Director of Quality and Food Safety

Tree Top, Inc.

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